

# **EXHIBIT B**



Paul A. Saso  
Director

Gibbons P.C.  
One Pennsylvania Plaza  
37th Floor  
New York, NY 10119-3701  
Direct: 212-613-2171 Fax: 212-554-9686  
psaso@gibbonslaw.com

May 24, 2021

**VIA EMAIL**

Alexander Zuckerman, Esq.  
Quinn Emanuel Urquhart & Sullivan, LLP  
Fifty-one Madison Avenue, 22nd Floor  
New York, New York 10010

**Re: ICT v. Hewlett Packard Financial Services India  
(D. Mass.) Index No. 16-cv-10386**

Dear Alex,

We write to inform you that Defendants are rejecting document productions that Plaintiffs purported to make on or after January 29, 2021, with a few exceptions. Plaintiffs have belatedly produced ICT 0801564-0802222. Defendants are rejecting the entirety of those document productions, with the following exceptions:

- Yu's costs potentially related to her **MEDICAL INFO** (ICT0801597);
- Yuyi's medical records produced prior to his deposition (ICT0801578; ICT0801579; ICT0801580; ICT0801582-85; ICT0801587; ICT0801595; ICT0801612);
- Styller's Allways Health Partners records (ICT0801613-29) -- because Plaintiffs assisted Defendants in obtaining these records from Allways and Defendants served a subpoena on Allways for these records long before the close of discovery;
- Dr. Bardey's examination notes that pre-date February 1, 2021 -- (ICT0801971-77; ICT0801980-83; ICT0802001-04 (except for the bottom of page ICT0802004, which appear to be notes dated 02/03/2021); ICT0802040-43 (except for the bottom of page ICT0802043 which appear to be notes dated 02/04/2021));
- Dr. Bardey's video recordings of interviews that he conducted with Plaintiffs prior to February 1, 2021 -- (ICT0801978-79); and
- Dr. Bardey's raw data that pre-date February 1, 2021 -- (ICT0802131-42; ICT0802143-48).

All other documents produced between ICT 0801564-0802222 are hereby rejected.

GIBBONS P.C.

Alex Zuckerman  
May 24, 2021  
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Paul A. Saso". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Paul A. Saso  
Director

cc: Jonathan Oblak, Esq.  
Alexander Spiro, Esq.  
Luke Nikas, Esq.  
Michael Bunis, Esq.  
Mark Edgerton, Esq.  
Kevin Quigley, Esq.